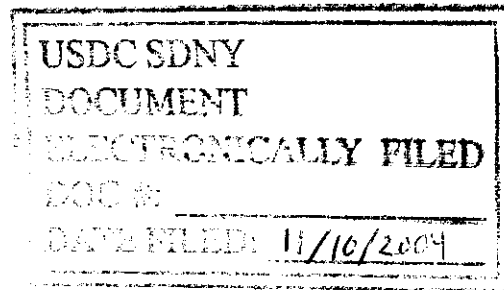


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Richard A. Kissel (RK-0072)



-----X	:	
SR INTERNATIONAL BUSINESS	:	UNITED STATES DISTRICT COURT
INSURANCE COMPANY,	:	SOUTHERN DISTRICT OF NEW YORK
	:	
Plaintiff,	:	Case Number: 04-CV-4567 (DLC)
	:	
v.	:	
	:	
MCI, INC., BERNARD EBBERS, SCOTT	:	
D. SULLIVAN, BETTY L. VINSON,	:	<b><u>STIPULATION AND ORDER</u></b>
TROY M. NORMAND, BUFORD YATES	:	
JR, SUSAN G. BELL, CLIFFORD A.	:	
ALEXANDER JR., JAMES C. ALLEN,	:	
JUDITH AREEN, CARL J. AYCOCK,	:	
RONALD R.BEAUMONT, FRANCESCO	:	
GALESI, STILES A. KELLETT JR,	:	
GORDON S MACKLIN, DAVID F.	:	
MYERS, JOHN A. PORTER, BERT C.	:	
ROBERTS JR., ESTATE OF JOHN W.	:	
SIDGMORE, LAWRENCE A. TUCKER,	:	
AND MAX E. BOBBIT,	:	
	:	
Defendants.	:	
-----X	:	

Plaintiff SR International Business Insurance Company ("SRI"), by its attorneys, and defendant Betty L. Vinson ("Vinson"), *pro se*, hereby agree that this action shall be, and hereby is, stayed as to defendant Vinson subject to the following provisions:

1. Vinson agrees to be bound by any court determinations made or issued in this Action, including decisions, judgments, orders and rulings, during the period this stay is in effect insofar as and to the same extent that such determinations apply to all defendants who have appeared, except to the extent that such decisions, judgments, orders and rulings might be inconsistent with the stay agreed to herein;

2. SRI agrees to be bound by any court determinations made or issued in this Action, including decisions, judgments, orders and rulings, during the period this stay is in effect to the same extent that it would be bound if Vinson were an active party in the Action, except to the extent that such decisions, judgments, orders and rulings might be inconsistent with the stay agreed to herein;

3. During the period this stay is in effect, SRI agrees not to seek any discovery from Vinson, except as to the extent provided in paragraph 7 of this stipulation;

4. During the period this stay is in effect, Sullivan agrees not to assert any alleged rights with respect to the SRI Policy, and agrees not to assert in any proceeding that SRI breached any alleged obligation it had under the Policy during this period;

5. Vinson is not required to respond to the complaint while this stay is in effect;

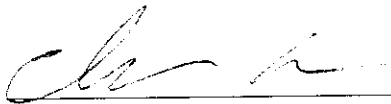
6. This stay shall automatically terminate immediately following Vinson's sentencing for conspiracy to commit securities fraud and securities fraud, to which Vinson pleaded guilty on October 10, 2002;

7. Vinson agrees that after a verdict in Bernard Ebbers' Southern District of New York criminal proceeding, for which Vinson is a cooperating witness, and until such time that this stay automatically terminates as set forth in paragraph 6 of this stipulation, SRI will be entitled to limited discovery from Vinson, to the extent that such discovery does not implicate her Fifth Amendment

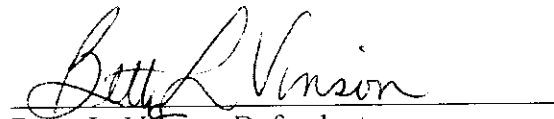
privileges;

8. Either party may seek to terminate or modify this order at any time by agreement or by appropriate application to the court.


Dated: October 27, 2004  
New York, New York



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Attorneys for Plaintiff, SR International  
Business Insurance Company

  
Betty L. Vinson, Defendant

SO ORDERED:

  
Denise L. Cote, U.S.D.J.  
November 9, 2004